

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

**MICHAEL P. O'NEIL and NICOLA
GRASSO**

Plaintiffs,

v.

**PETER F. NERONHA, in his Official
Capacity as Attorney General of Rhode
Island and COLONEL JAMES M.
MANNI, in his Official Capacity as the
Superintendent of the Rhode Island State
Police**

Defendants.

Civil Action No. 19-cv-00612

**DEFENDANTS' JOINT MOTION FOR SECOND EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S COMPLAINT**

Now come Defendants, the State of Rhode Island, Peter Neronha, in his official capacity as Attorney General of the State of Rhode Island and Colonel James Manni, in his official capacity as Director of the Rhode Island State Police (State of Rhode Island Defendants) and respectfully request an additional six days, up to and including January 24, 2020, to respond to Plaintiffs' Complaint. Defendants need additional time to respond to Plaintiffs' Complaint. Given the various claims asserted and the issues that need to be considered and addressed, Defendants require additional time to provide an appropriate response to the Complaint.

Wherefore, the State of Rhode Island Defendants pray that this Motion for an Extension of Time is granted, and that Defendants be given up to and including January 24, 2020 to file their responsive pleading.

Respectfully submitted,

DEFENDANTS, in their official capacities
only

By,

PETER F. NERONHA
ATTORNEY GENERAL

/s/ Julia C. Wyman
Julia C. Wyman, #9017
Special Assistant Attorney General
Neil F.X. Kelly #4515
Assistant Attorney General
150 South Main Street
Providence, RI 02903-2907
Tel: (401) 274-4400 x2037; x2284
Fax: (401) 222-2995

CERTIFICATION

I hereby certify that I filed and served all counsel of record with a copy of the within Defendants' Joint Motion through the ECF filing system on this 15th day of January, 2020 and that it is available for viewing and downloading.

/s/ Dylan R. Gaddes